



Procedure: Separation of Duties at the Clinic Level

Functional Area: VIII Certification Eligibility and Coordination of Services

Section: A 12 Eligibility Determination and Documentation

Citation: 246.4(a)(26)

Approval Date: **DRAFT 7/29/15**

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Purpose	To describe the staffing requirements for determining eligibility criteria for the certification of WIC participants.
Separation of Duties	A single WIC staff person is not permitted to determine eligibility for all certification sections for a client.
Certification Sections	<p>The two sections of WIC Certification are:</p> <ol style="list-style-type: none">1) Assessing and determining eligibility based on:<ol style="list-style-type: none">a) Incomeb) Identificationc) Residency<i>*Voter registration is also completed as part of section 1.</i>2) Assessing and determining eligibility based on:<ol style="list-style-type: none">a) Nutrition/Health Assessment and Assigning Riskb) Assigning Benefits (food package)
Staffing	<p>The two sections must be completed by two separate WIC staff members. To assure this process, these sections are set up as separate roles in the Journey system.</p> <ol style="list-style-type: none">1) The Clerical position is recommended for Section One.2) A Competent Professional Authority (CPA) is required for Section Two. <p>Following a completed Certification using the above procedure, WIC benefits (Food Instruments--FIs) can be issued by either staff member, Clerk or CPA.</p>
Limited Exceptions--Staffing Shortages at Small Clinics	<p>In the event only two staff are present at the clinic and they are both CPA's, one CPA should be assigned to complete Section One and the other CPA to complete Section Two. If only a single CPA is present, that CPA may be able to complete both Section One and Section Two. These exceptions require approval for a temporary change in roles from a State WIC Coordinator.</p> <p>Approval for exceptions will require a call to the state WIC Help Desk to obtain a temporary role in Journey to complete duties not already assigned. When a change in roles is needed, a call to the Help Desk should be made prior to the clinic day whenever possible.</p>

**Limited Exceptions—
Alternate Staffing
Patterns**

Any staffing pattern used on a regular basis that differs from the patterns described above, must be approved on a case by case basis by one of the State WIC Coordinators. The Local Agency WIC Director or Supervisor must submit a request in writing to get permission for use of an alternate staffing pattern in a specific clinic. The request must include a description of why needed, list of staff who will provide services and their roles (clerk, CPA) and a length of time requested for the exception.

**Review Required for
Exceptions**

A one time or limited exception for a staffing pattern where a single CPA completes Sections One and Two, requires a follow-up review. The purpose of the review is assure program integrity. That review must be completed within 30 days by a different CPA, designated by the Local Agency WIC Director/Coordinator. The review should verify that the certification was completed accurately including: documentation and proofs match; appropriate risks assigned based on nutrition interview; food package assigned and checks issued according to WIC procedures; and all required documentation is present. All reviews should be documented outside of Journey in a spreadsheet/file that includes the date of review, name of reviewer and results.
